

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**UNITED STATES OF AMERICA**

**VS.**

**ISMAEL LECHUGA**

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§

**CR. NO. 7:16-CR-876**

**MOTION FOR NOTICE AND DISCLOSURE  
OF RULE 404(B) MATERIAL**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**COMES NOW, ISMAEL LECHUGA** Defendant in the above entitled and numbered cause, by and through counsel, and respectfully moves this Honorable Court to Order the Government to disclose all evidence it intends to produce at trial pursuant to Rule 404(b), Federal Rules of Evidence, and to hold a pre-trial hearing regarding the admissibility of any such evidence pursuant to Rule 104(a), Federal Rules of Evidence.

It is requested that the Government provide notice of any evidence that it intends to use pursuant to this rule so that prior to trial the Defendant may analyze and brief the issues. Should this procedure be followed it will promote judicial economy in that it will minimize trial delay and interruptions on those various issues.

Respectfully Submitted,

**/S/CRISPIN (C.J.) QUINTANILLA, III**  
**CRISPIN (C.J.) QUINTANILLA, III**  
**State Bar No. 16436330**  
**Federal I.D. No. 12431**

**GARCIA, QUINTANILLA & PALACIOS**  
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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the above and foregoing **MOTION**  
**FOR NOTICE AND DISCLOSURE OF RULE 404B MATERIAL** has been forwarded to the  
AUSA, Patricia Profit by via e-filing on this 15<sup>TH</sup> day of July, 2016.

**/S/CRISPIN (C.J.) QUINTANILLA, III**  
**CRISPIN (C.J.) QUINTANILLA, III**

**CERTIFICATE OF CONFERENCE**

This is to certify that I, **CRISPIN (C.J.) QUINTANILLA, III**, counsel for defendant,  
has consulted with the Assistant United States Attorney, Patricia Profit assigned to this case in an  
attempt to obtain the requested relief, with reference to defendant's Motion for notice and  
disclosure of Rule 404B material, and she was opposed.

**/S/CRISPIN (C.J.) QUINTANILLA, III**  
**CRISPIN (C.J.) QUINTANILLA, III**